

Message

From: Cavallo, Greg [Greg.Cavallo@drbc.nj.gov]
Sent: 8/8/2018 2:56:38 PM
To: Rice, Scott [Rice.Scott@epa.gov]
CC: Suk, Namsoo [Namsoo.Suk@drbc.nj.gov]
Subject: RE: Palmerton Zinc Site
Attachments: 0118_001 (002).pdf

Mr. Rice,

Your name was identified in a notice of noncompliance issued to Mr. Bruce Lack of Phase 3 Environmental LLC (copy attached) as the EPA contact person. I am a senior geologist with the Delaware River Basin Commission which has an interest in material being used as fill at the Palmerton Zinc site. I have recently become aware that regulated fill material containing PCBs was being transported to the site from New Jersey, New York and Connecticut to be used as amendments in the revegetation of impacted areas. And that some of the fill material proposed for utilization at the site exceeds the TSCA threshold of 2 ppm total PCBs

As you may be aware the Commission has been involved in implementation of the PCB TMDL for the tidal Delaware River and Bay estuary for more than a decade, in conjunction with the states of Pennsylvania, Delaware, New Jersey and EPA regions 2 and 3. As part of this effort we have measured PCB concentrations in non-tidal tributaries and the main-stem Delaware River to evaluate impacts downstream. Measurement taken in the non-tidal portions of the Delaware River above the head of tide have exhibited significant loadings of PCBs including samples collected near the mouth of the Lehigh River. Our concern is the potential impact of PCB contaminated fill material on the water quality in Lehigh River and ultimately the main-stem Delaware River.

A review of the notice of noncompliance indicates that specific information regarding this material be provided within 30 days of receipt of the letter. We would like to request a copy of Phase III Environmental's response document, and would like to discuss their responses with you and the potential implications on the on-going PCB TMDL. My contact information is provided in this email and I understand your telephone number to be 304-231-0501.

Thank you

greg

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